

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

YUDONG ZHU

YE LI,

Defendants.

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§
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§

13-cr-761 (VM)

Electronically Filed

NOTICE OF MOTION OF DR.

YUDONG ZHU TO SUPPRESS

EVIDENCE SEIZED FROM

LAPTOP COMPUTER AND THE

FRUITS OF SUCH EVIDENCE

PLEASE TAKE NOTICE that upon the annexed declarations of John D. Cline and Dr. Yudong Zhu, the exhibits thereto, the accompanying memorandum of law, and the entire record in this case, the defendant DR. YUDONG ZHU will move before the Honorable Victor Marrero, United States District Judge, at the United States Courthouse located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, under Fed. R. Crim. P. 12(b)(3) and the Fourth Amendment to the United States Constitution for an Order granting Dr. Zhu's motion to suppress all evidence obtained from the laptop computer Dr. Zhu surrendered to New York University in May 2013, and the fruits of all such evidence.

To the extent there are factual disputes material to a determination of this motion, Dr. Zhu requests an evidentiary hearing.

Dated: March 14, 2014

Respectfully submitted,

/s/ John D. Cline

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CERTIFICATE OF SERVICE

This is to certify that on this the 14th day of March, 2014, I caused to be filed a true and correct copy of the instant Notice of Motion using the Southern District of New York's Electronic Case Filing system ("ECF") which will send a notice of filing to all counsel of record.

/s/ John D. Cline
JOHN D. CLINE